



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

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OFFICE OF
ECOSYSTEMS, TRIBAL AND
PUBLIC AFFAIRS

July 18, 2011

Scott Conroy, Forest Supervisor:
C/O Steven R Johnson, Project Lead
Ashland Ranger Station
645 Washington St.
Ashland, Oregon 97520-1402

Re: U.S. Environmental Protection Agency (EPA) comments for the Rogue River-Siskiyou National Forest (Forest) Mt. Ashland Ski Area Expansion (Expansion) Final Supplemental Environmental Impact Statement (FSEIS) and Supplemental Record of Decision (ROD).
EPA Project Number: 99-078-AFS.

Dear Mr. Conroy and Mr. Johnson:

This review was conducted in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act.

To ensure that aquatic ecosystems and the City of Ashland's municipal water supply are fully protected we recommended in our May 10, 2010 DSEIS comments that the, "Forest develop and disclose a detailed adaptive management framework." In general, we agree with your response to our comment, "The 2004 ROD contained and required an extensive Monitoring Plan,...Adaptive Management was a key element of the design and methodology described in this plan" (FSEIS, p. B-36). Indeed, the 2004 Monitoring Plan - which is incorporated by reference and required by the 2011 Supplemental ROD - includes many environmentally protective adaptive management elements.

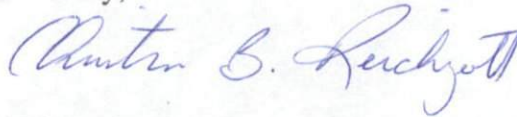
We especially appreciate several features of the Monitoring Plan's "Soil and Site Productivity" section, particularly the monitoring methods and specific thresholds for "Bare Soil Exposure" and "Detrimental Soil Disturbance". These detailed monitoring methods and quantitative thresholds (ROD Table C-3) address the need to minimize soil erosion and sedimentation impacts by providing clear directions for the development of annual implementation monitoring summary reports. These reports, in turn, should facilitate effectiveness evaluations, and, if thresholds are not being met, adaptive management. We recognize this accomplishment.

To help improve adaptive management responses for this project and account for a lack of a quantitative threshold for "Sediment Transport" monitoring, we noted in our May 10, 2010 DSEIS comments, "For Sediment Transport monitoring to be effectively used, we believe that monitoring results should be linked with clear and specific decision thresholds and management responses." Although the FSEIS and Supplemental ROD provide no additional specific threshold for "Sediment Transport" we appreciate how the monitoring methods described on page C-19 would facilitate reporting and effectiveness evaluations. The Supplemental ROD provides no additional information on specific management responses.

Because specific management responses are not included in the Monitoring Plan we encourage the Forest's careful consideration of annual implementation monitoring reports and support efforts to modify the project if critical objectives are not being met.

Thank you for this opportunity to comment and if you have any questions or concerns please contact me at (206) 553-1601 or by electronic mail at reichgott.christine@epa.gov, or contact Erik Peterson of my staff at (206) 553-6382 or by electronic mail at peterston.erik@epa.gov.

Sincerely,

A handwritten signature in blue ink that reads "Christine B. Reichgott". The signature is written in a cursive, flowing style.

Christine B. Reichgott, Manager
Environmental Review and Sediment Management Unit